



December 4, 2012

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA 12-1863, IB Docket No. 12-340; RM-11683

Dear Secretary Dortch:

On behalf of YourTel America, Inc., I am writing in support of LightSquared's recent License Modification Application and its proposal to build a nationwide 4G LTE wireless network and operate it on a wholesale-only basis. YourTel America, Inc. is a small, privately owned telecommunications carrier that provides local, long distance, and wireless service to low income customers in Kansas, Missouri, Oklahoma, Maine, Pennsylvania, Rhode Island, Washington and Illinois.

As the Commission knows well, our country's mobile wireless infrastructure must be sufficiently robust to not only handle current mobile wireless consumption but also encourage innovations, new goods and services. So long as there is access to sufficient bandwidth, the economic growth opportunities of mobile broadband are simply limitless. The challenge to American competitiveness in the global market is real, and much hinges on the Commission's ability to make spectrum available in a manner that unleashes the waves of innovation associated with additional mobile broadband capacity.

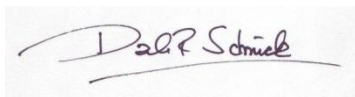
LightSquared's proposal to permanently relinquish terrestrial use of the "upper 10 MHz" and to share 5 MHz of federal spectrum in the wholesale provision of LTE service nationwide will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve customers. For example, LightSquared's planned network would allow YourTel to deliver Broadband to low-income communities as they will bring us (i) affordable pricing that enables us to operate sustainably, (ii) low startup costs with rapid on-boarding and integration to the wholesale network, (iii) ubiquitous wireless service in our markets, (iv) flexible billing options that in turn allow us to offer the extreme elasticity required for our subscribers, (v) customer fulfillment services that ensure the customer receives their device and service at the point of sale and (vi) a wide presence in the market with the leverages of multi-lingual, multiple retail locations.

Absent a robust offering like LightSquared's, we will continue to be impeded in serving low-income, unserved and underserved communities with Broadband services. Wholesale partnering options with local providers continue to be unworkable due to (i) the nature of their business model, and their pricing and equipment choices, neither of which can be tailored to meet our customer's needs. These minimum requirements can only be met through a service offering with the liveness LightSquared's business model offers.

More specifically, LightSquared's wholesale-only model will allow wholesale partners to overcome the high barriers to market entry – including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity – that could otherwise unduly raise operating costs, or preclude us from providing expanded coverage or innovative services altogether.

Hundreds of millions of American consumers would benefit from the competition, coverage and innovations that would be made possible by LightSquared's network. Accordingly, we urge the Commission to grant LightSquared's Application and proposal to deploy a wholesale-only LTE network as quickly as possible.

Respectfully submitted,

A handwritten signature in dark ink, reading "Dale R. Schmick", is written over a light blue horizontal line.

Dale R. Schmick
Vice President
YourTel America, Inc.